

EXHIBIT B

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC
Related Case No. 4:23-cv-06663

**PLAINTIFF CHRISTOPHER GOLDEN'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS,
INC.'S FIRST SET OF
INTERROGATORIES**

OBJECTIONS AND RESPONSES TO INDIVIDUAL INTERROGATORIES

INTERROGATORY NO. 1:

IDENTIFY all PERSONS who had a role, involvement, and/or contribution to the creation of each of YOUR ASSERTED WORKS, including by providing (i) their contact information; (ii) a description of their role, involvement, or contribution; (iii) how if at all they were compensated; and (iv) whether there is any agreement with such PERSONS relating to the ownership of YOUR ASSERTED WORKS.

RESPONSE TO INTERROGATORY NO. 1:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is compound, overbroad in nature, and is nonsensical. Each subpart is a separate Interrogatory, each which counts toward Defendant's limit under the Federal Rules. Plaintiff objects to the terms "their role, involvement, and/or contribution" as vague and ambiguous. Plaintiff objects to the term "agreement" as vague and ambiguous. Plaintiff objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the interrogatory seeks "all PERSONS." Plaintiff further objects to this Interrogatory to the extent that it calls for a response subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure.

Without foregoing the above general and specific objections and to the extent possible, Plaintiff responds that he will identify only PERSONS, other than Plaintiff, a) who were direct aides (e.g., researchers), who were paid to contribute to the ASSERTED WORKS or b) those whose work was used in the ASSERTED WORKS under a license. Plaintiff responds that neither (a) nor (b) is applicable to Plaintiff's ASSERTED WORKS.

INTERROGATORY NO. 2:

IDENTIFY all PERSONS (including, but not limited to YOU and YOUR publishers) who claim an ownership interest in any of YOUR ASSERTED WORKS (whether by assignment, license, or otherwise), including by providing (i) their contact information; and (ii) a description of their ownership interest.

RESPONSE TO INTERROGATORY NO. 2:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Interrogatory to the extent that the term “ownership interest” is vague and ambiguous. Plaintiff further objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case. Plaintiff objects to this Interrogatory to the extent that it is duplicative, in whole or in part, of Meta’s First Set of Requests for Production No. 10.

Without foregoing the above general and specific objections and to the extent possible, Plaintiff states that pursuant to Federal Rule of Civil Procedure 33, he will produce documents, identifying all PERSONS (including, but not limited to Plaintiff and his publishers) who claim an ownership interest in any of Plaintiff’s ASSERTED WORKS (whether by assignment, license, or otherwise), which includes (i) their contact information; and (ii) a description of their ownership interest, if those documents exist. Plaintiff further refers the propounding party to Plaintiff’s response to Meta’s First Set of Requests for Production No. 10.

INTERROGATORY NO. 3:

IDENTIFY and DESCRIBE the basis for YOUR assertion of copyright ownership in each of YOUR respective ASSERTED WORKS, including all evidence upon which YOU based such assertion.

RESPONSE TO INTERROGATORY NO. 3:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Interrogatory to the extent that the term “basis for YOUR assertion” is vague and the term “copyright ownership” is ambiguous. Plaintiff further objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the interrogatory seeks “all evidence.”

RESPONSE TO INTERROGATORY NO. 9:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Interrogatory to the extent that the terms “authorized channels” and “otherwise” are vague and ambiguous. Plaintiff further objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case.

Without foregoing the above general and specific objections and to the extent possible, Plaintiff responds that given the requested information is unknown to Plaintiff and the Interrogatory is impossible to answer as written, Plaintiff is willing to meet and confer regarding the scope of information sought by this Interrogatory.

INTERROGATORY NO. 10:

DESCRIBE all damages or other injury YOU have allegedly suffered as a result of Meta’s conduct alleged in the ACTION, including but not limited to IDENTIFICATION of all bases for such damages or injury, any financial figures or DOCUMENTS used or referenced as the basis for computing such damages, methodology for computing such damages and injury, and all PERSONS who supplied knowledge or information that informed the foregoing.

RESPONSE TO INTERROGATORY NO. 10:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Interrogatory to the extent that the term “damages” is vague and overbroad. Plaintiff objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the interrogatory seeks “all PERSONS who supplied knowledge or information.” Plaintiff objects to this Interrogatory to the extent that it calls for a response subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff further objects to this Interrogatory to the extent that it calls for information relating to damages that will be the subject of expert discovery, and objects to the extent that this

1 Interrogatory seeks information related to expert witness work product. Plaintiff objects to this
2 Interrogatory on the grounds that such information is equally available to Defendant, or is already in its
3 possession, custody, or control. Plaintiff objects to this Interrogatory to the extent that it is duplicative,
4 in whole or in part, of Meta's First Set of Requests for Production Nos. 23, 24, 25, 26.

5 Without foregoing the above general and specific objections and to the extent possible, Plaintiff
6 responds that this Interrogatory is premature, and Plaintiff will not respond to the Interrogatory at this
7 time.

8 **INTERROGATORY NO. 11:**

9 IDENTIFY each PERSON, other than Plaintiffs' respective attorneys, who supplied
10 information in response to Meta's discovery requests in this ACTION (including Document Requests,
11 Requests for Admission, and Interrogatories propounded by Meta) and/or whose DOCUMENTS or
12 data were consulted in connection with such responses, and, as to the Interrogatories, specify for which
13 Interrogatories such PERSON has supplied information.

14 **RESPONSE TO INTERROGATORY NO. 11:**

15 Subject to and without waiving any of the general objections, and subject to such additional facts
16 that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
17 Interrogatory to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
18 Interrogatory to the extent that the term "data" is vague and ambiguous. Plaintiff further objects to this
19 Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the
20 needs of the case, particularly because the interrogatory seeks "each PERSON." Plaintiff objects to this
21 Interrogatory to the extent that it calls for a response subject to the attorney-client privilege, work
22 product doctrine, and/or any other applicable privilege or protection from disclosure.

23 Without foregoing the above general and specific objections and to the extent possible, Plaintiff
24 responds that Plaintiff and their counsel were the PERSONS supplying information in response to
25 Meta's First Set of Interrogatories.

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC

**PLAINTIFF ANDREW SEAN GREER'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS, INC.'S
FIRST SET OF INTERROGATORIES**

Lead Case No. 3:23-cv-03417-VC

PLAINTIFF ANDREW SEAN GREER'S RESPONSES AND OBJECTIONS TO DEFENDANT META PLATFORMS,
INC.'S FIRST SET OF INTERROGATORIES

OBJECTIONS AND RESPONSES TO INDIVIDUAL INTERROGATORIES

INTERROGATORY NO. 1:

IDENTIFY all PERSONS who had a role, involvement, and/or contribution to the creation of each of YOUR ASSERTED WORKS, including by providing (i) their contact information; (ii) a description of their role, involvement, or contribution; (iii) how if at all they were compensated; and (iv) whether there is any agreement with such PERSONS relating to the ownership of YOUR ASSERTED WORKS.

RESPONSE TO INTERROGATORY NO. 1:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is compound, overbroad and unduly burdensome. Each subpart is a separate Interrogatory, each which counts separately toward Plaintiffs' limit under the Federal Rules. Plaintiff objects to the terms "their role, involvement, and/or contribution" as vague and ambiguous. Plaintiff objects to the term "agreement" as vague and ambiguous. Plaintiff further objects to this Interrogatory as seeking information not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the interrogatory seeks "all PERSONS." Plaintiff further objects to this Interrogatory to the extent that it calls for a response subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure.

Subject to the above general and specific objections and to the extent possible, Plaintiff responds that he will identify only PERSONS, other than Plaintiff, a) who were direct aides (e.g., researchers), who were paid to contribute to the ASSERTED WORKS or b) those whose work was used in the ASSERTED WORKS under a license. Subject to the above general and specific objections, Plaintiff responds that neither (a) nor (b) is applicable to Plaintiff's ASSERTED WORKS.

INTERROGATORY NO. 2:

IDENTIFY all PERSONS (including, but not limited to YOU and YOUR publishers) who claim an ownership interest in any of YOUR ASSERTED WORKS (whether by assignment, license,

or otherwise), including by providing (i) their contact information; and (ii) a description of their ownership interest.

RESPONSE TO INTERROGATORY NO. 2:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this Interrogatory to the extent that the term “ownership interest” is vague and ambiguous. Plaintiff further objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case. Plaintiff objects to this Interrogatory to the extent that it is duplicative, in whole or in part, of Meta’s First Set of Requests for Production No. 10.

Subject to the above general and specific objections and to the extent possible, Plaintiff states that pursuant to Federal Rule of Civil Procedure 33, she will produce documents, identifying all PERSONS (including, but not limited to Plaintiff and his publishers) who claim an ownership interest in any of Plaintiff’s ASSERTED WORKS (whether by assignment, license, or otherwise), which includes (i) their contact information; and (ii) a description of their ownership interest, if those documents exist. Plaintiff further refers Defendant to Plaintiff’s response to Meta’s First Set of Requests for Production No. 10.

INTERROGATORY NO. 3:

IDENTIFY and DESCRIBE the basis for YOUR assertion of copyright ownership in each of YOUR respective ASSERTED WORKS, including all evidence upon which YOU based such assertion.

RESPONSE TO INTERROGATORY NO. 3:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this Interrogatory to the extent that the term “basis for YOUR assertion” is vague and the term “copyright ownership” is ambiguous. Plaintiff further objects to this Interrogatory as unduly burdensome, not

1 Plaintiff objects to this Interrogatory to the extent that it is duplicative, in whole or in part, of
2 Interrogatory Nos. 5, 6 and 7 and Meta's First Set of Requests for Production Nos. 2 and 3.

3 Subject to the above general and specific objections and to the extent possible, Plaintiff
4 responds that Plaintiff is willing to meet and confer to narrow the scope of this Interrogatory.

5 **INTERROGATORY NO. 9:**

6 IDENTIFY all authorized channels through which YOUR ASSERTED WORKS have been
7 made available to the public, whether for sale or otherwise, including all websites (by URL) and retail
8 outlets (by name and location) and the dates they were available in such channels.

9 **RESPONSE TO INTERROGATORY NO. 9:**

10 Subject to and without waiving any of the general objections, and subject to such additional
11 facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
12 Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this
13 Interrogatory to the extent that the terms "authorized channels" and "otherwise" are vague and
14 ambiguous. Plaintiff further objects to this Interrogatory as unduly burdensome, not relevant to any
15 claim or defense, and disproportionate to the needs of the case.

16 Subject to the above general and specific objections and to the extent possible, Plaintiff
17 responds that given that the requested information is unknown to Plaintiff and the Interrogatory is
18 impossible to answer as written, Plaintiff is willing to meet and confer regarding the scope of
19 information sought by this Interrogatory.

20 **INTERROGATORY NO. 10:**

21 DESCRIBE all damages or other injury YOU have allegedly suffered as a result of Meta's
22 conduct alleged in the ACTION, including but not limited to IDENTIFICATION of all bases for such
23 damages or injury, any financial figures or DOCUMENTS used or referenced as the basis for
24 computing such damages, methodology for computing such damages and injury, and all PERSONS
25 who supplied knowledge or information that informed the foregoing.

26 **RESPONSE TO INTERROGATORY NO. 10:**

27 Subject to and without waiving any of the general objections, and subject to such additional
28 facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this

1 Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this
2 Interrogatory to the extent that the term “damages” is vague and overbroad. Plaintiff objects to this
3 Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the
4 needs of the case, particularly because the interrogatory seeks “all PERSONS who supplied knowledge
5 or information.” Plaintiff objects to this Interrogatory to the extent that it calls for a response subject to
6 the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection
7 from disclosure. Plaintiff further objects to this Interrogatory to the extent that it is premature as it calls
8 for information relating to damages that will be the subject of expert discovery, and objects to the
9 extent that this Interrogatory seeks information related to expert witness work product. Plaintiff also
10 objects to this Interrogatory on the grounds that the information requested is equally available to
11 Defendant, or is already in its possession, custody, or control. Plaintiff objects to this Interrogatory to
12 the extent that it is duplicative, in whole or in part, of Meta’s First Set of Requests for Production Nos.
13 23, 24, 25, and 26.

14 Subject to the above general and specific objections Plaintiff will not respond to the
15 Interrogatory at this time.

16 **INTERROGATORY NO. 11:**

17 IDENTIFY each PERSON, other than Plaintiffs’ respective attorneys, who supplied
18 information in response to Meta’s discovery requests in this ACTION (including Document Requests,
19 Requests for Admission, and Interrogatories propounded by Meta) and/or whose DOCUMENTS or
20 data were consulted in connection with such responses, and, as to the Interrogatories, specify for which
21 Interrogatories such PERSON has supplied information.

22 **RESPONSE TO INTERROGATORY NO. 11:**

23 Subject to and without waiving any of the general objections, and subject to such additional
24 facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
25 Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this
26 Interrogatory to the extent that the term “data” is vague and ambiguous. Plaintiff further objects to this
27 Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the
28 needs of the case, particularly because the interrogatory seeks “each PERSON.” Plaintiff objects to this

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Plaintiffs and the Proposed Class*

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC
Related Case No. 4:23-cv-06663

**PLAINTIFF RICHARD KADREY'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS,
INC.'S FIRST SET OF
INTERROGATORIES**

OBJECTIONS AND RESPONSES TO INDIVIDUAL INTERROGATORIES

INTERROGATORY NO. 1:

IDENTIFY all PERSONS who had a role, involvement, and/or contribution to the creation of each of YOUR ASSERTED WORKS, including by providing (i) their contact information; (ii) a description of their role, involvement, or contribution; (iii) how if at all they were compensated; and (iv) whether there is any agreement with such PERSONS relating to the ownership of YOUR ASSERTED WORKS.

RESPONSE TO INTERROGATORY NO. 1:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is compound, overbroad in nature, and is nonsensical. Each subpart is a separate Interrogatory, each which counts toward Defendant's limit under the Federal Rules. Plaintiff objects to the terms "their role, involvement, and/or contribution" as vague and ambiguous. Plaintiff further objects to the term "agreement" as vague and ambiguous. Plaintiff objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the interrogatory seeks "all PERSONS." Plaintiff further objects to this Interrogatory to the extent that it calls for a response subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure.

Without foregoing the above general and specific objections and to the extent possible, Plaintiff responds that he will identify only PERSONS, other than Plaintiff, a) who were direct aides (e.g., researchers), who were paid to contribute to the ASSERTED WORKS or b) those whose work was used in the ASSERTED WORKS under a license. Plaintiff responds in *Sandman Slim*, lyrics from the 2002 song "Alice" were used with permission of the songwriters, Tom Waits and Kathleen Brennan. The contract granting this permission cannot be located.

INTERROGATORY NO. 2:

IDENTIFY all PERSONS (including, but not limited to YOU and YOUR publishers) who claim an ownership interest in any of YOUR ASSERTED WORKS (whether by assignment, license, or

otherwise), including by providing (i) their contact information; and (ii) a description of their ownership interest.

RESPONSE TO INTERROGATORY NO. 2:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Interrogatory to the extent that the term “ownership interest” is vague and ambiguous. Plaintiff further objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case. Plaintiff objects to this Interrogatory to the extent that it is duplicative, in whole or in part, of Meta’s First Set of Requests for Production No. 10.

Without foregoing the above general and specific objections and to the extent possible, Plaintiff states that pursuant to Federal Rule of Civil Procedure 33, he will produce documents, identifying all PERSONS (including, but not limited to Plaintiff and his publishers) who claim an ownership interest in any of Plaintiff’s ASSERTED WORKS (whether by assignment, license, or otherwise), which includes (i) their contact information; and (ii) a description of their ownership interest, if those documents exist. Plaintiff further refers the propounding party to Plaintiff’s response to Meta’s First Set of Requests for Production No. 10.

INTERROGATORY NO. 3:

IDENTIFY and DESCRIBE the basis for YOUR assertion of copyright ownership in each of YOUR respective ASSERTED WORKS, including all evidence upon which YOU based such assertion.

RESPONSE TO INTERROGATORY NO. 3:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Interrogatory to the extent that the term “basis for YOUR assertion” is vague and the term “copyright ownership” is ambiguous. Plaintiff further objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the interrogatory seeks “all evidence.”

RESPONSE TO INTERROGATORY NO. 9:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Interrogatory to the extent that the terms “authorized channels” and “otherwise” are vague and ambiguous. Plaintiff further objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case.

Without foregoing the above general and specific objections and to the extent possible, Plaintiff responds that given the requested information is unknown to Plaintiff and the Interrogatory is impossible to answer as written, Plaintiff is willing to meet and confer regarding the scope of information sought by this Interrogatory.

INTERROGATORY NO. 10:

DESCRIBE all damages or other injury YOU have allegedly suffered as a result of Meta’s conduct alleged in the ACTION, including but not limited to IDENTIFICATION of all bases for such damages or injury, any financial figures or DOCUMENTS used or referenced as the basis for computing such damages, methodology for computing such damages and injury, and all PERSONS who supplied knowledge or information that informed the foregoing.

RESPONSE TO INTERROGATORY NO. 10:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Interrogatory to the extent that the term “damages” is vague and overbroad. Plaintiff objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the interrogatory seeks “all PERSONS who supplied knowledge or information.” Plaintiff objects to this Interrogatory to the extent that it calls for a response subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff further objects to this Interrogatory to the extent that it calls for information relating to damages that will be the subject of expert discovery, and objects to the extent that this

1 Interrogatory seeks information related to expert witness work product. Plaintiff objects to this
 2 Interrogatory on the grounds that such information is equally available to Defendant, or is already in its
 3 possession, custody, or control. Plaintiff objects to this Interrogatory to the extent that it is duplicative,
 4 in whole or in part, of Meta's First Set of Requests for Production Nos. 23, 24, 25, 26.

5 Without foregoing the above general and specific objections and to the extent possible, Plaintiff
 6 responds that this Interrogatory is premature, and Plaintiff will not respond to the Interrogatory at this
 7 time.

8 **INTERROGATORY NO. 11:**

9 IDENTIFY each PERSON, other than Plaintiffs' respective attorneys, who supplied
 10 information in response to Meta's discovery requests in this ACTION (including Document Requests,
 11 Requests for Admission, and Interrogatories propounded by Meta) and/or whose DOCUMENTS or
 12 data were consulted in connection with such responses, and, as to the Interrogatories, specify for which
 13 Interrogatories such PERSON has supplied information.

14 **RESPONSE TO INTERROGATORY NO. 11:**

15 Subject to and without waiving any of the general objections, and subject to such additional facts
 16 that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
 17 Interrogatory to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 18 Interrogatory to the extent that the term "data" is vague and ambiguous. Plaintiff further objects to this
 19 Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the
 20 needs of the case, particularly because the interrogatory seeks "each PERSON." Plaintiff objects to this
 21 Interrogatory to the extent that it calls for a response subject to the attorney-client privilege, work
 22 product doctrine, and/or any other applicable privilege or protection from disclosure.

23 Without foregoing the above general and specific objections and to the extent possible, Plaintiff
 24 responds that Plaintiff and their counsel were the PERSONS supplying information in response to
 25 Meta's First Set of Interrogatories.

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*Counsel for Individual and Representative
Plaintiffs and the Proposed Class*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC

**PLAINTIFF MATTHEW KLAM'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS, INC.'S
FIRST SET OF INTERROGATORIES**

OBJECTIONS AND RESPONSES TO INDIVIDUAL INTERROGATORIES

INTERROGATORY NO. 1:

IDENTIFY all PERSONS who had a role, involvement, and/or contribution to the creation of each of YOUR ASSERTED WORKS, including by providing (i) their contact information; (ii) a description of their role, involvement, or contribution; (iii) how if at all they were compensated; and (iv) whether there is any agreement with such PERSONS relating to the ownership of YOUR ASSERTED WORKS.

RESPONSE TO INTERROGATORY NO. 1:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is compound, overbroad and unduly burdensome. Each subpart is a separate Interrogatory, each which counts separately toward Plaintiffs' limit under the Federal Rules. Plaintiff objects to the terms "their role, involvement, and/or contribution" as vague and ambiguous. Plaintiff objects to the term "agreement" as vague and ambiguous. Plaintiff further objects to this Interrogatory as seeking information not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the interrogatory seeks "all PERSONS." Plaintiff further objects to this Interrogatory to the extent that it calls for a response subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure.

Subject to the above general and specific objections and to the extent possible, Plaintiff responds that he will identify only PERSONS, other than Plaintiff, a) who were direct aides (e.g., researchers), who were paid to contribute to the ASSERTED WORKS or b) those whose work was used in the ASSERTED WORKS under a license. Subject to the above general and specific objections, Plaintiff responds that he obtained permission to use seven lines from "Sea Level Elegy," by Sharon Olds in *Who is Rich?*

INTERROGATORY NO. 2:

IDENTIFY all PERSONS (including, but not limited to YOU and YOUR publishers) who claim an ownership interest in any of YOUR ASSERTED WORKS (whether by assignment, license,

or otherwise), including by providing (i) their contact information; and (ii) a description of their ownership interest.

RESPONSE TO INTERROGATORY NO. 2:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this Interrogatory to the extent that the term “ownership interest” is vague and ambiguous. Plaintiff further objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case. Plaintiff objects to this Interrogatory to the extent that it is duplicative, in whole or in part, of Meta’s First Set of Requests for Production No. 10.

Subject to the above general and specific objections and to the extent possible, Plaintiff states that pursuant to Federal Rule of Civil Procedure 33, she will produce documents, identifying all PERSONS (including, but not limited to Plaintiff and his publishers) who claim an ownership interest in any of Plaintiff’s ASSERTED WORKS (whether by assignment, license, or otherwise), which includes (i) their contact information; and (ii) a description of their ownership interest, if those documents exist. Plaintiff further refers Defendant to Plaintiff’s response to Meta’s First Set of Requests for Production No. 10.

INTERROGATORY NO. 3:

IDENTIFY and DESCRIBE the basis for YOUR assertion of copyright ownership in each of YOUR respective ASSERTED WORKS, including all evidence upon which YOU based such assertion.

RESPONSE TO INTERROGATORY NO. 3:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this Interrogatory to the extent that the term “basis for YOUR assertion” is vague and the term “copyright ownership” is ambiguous. Plaintiff further objects to this Interrogatory as unduly burdensome, not

1 Plaintiff objects to this Interrogatory to the extent that it is duplicative, in whole or in part, of
 2 Interrogatory Nos. 5, 6 and 7 and Meta's First Set of Requests for Production Nos. 2 and 3.

3 Subject to the above general and specific objections and to the extent possible, Plaintiff
 4 responds that Plaintiff is willing to meet and confer to narrow the scope of this Interrogatory.

5 **INTERROGATORY NO. 9:**

6 IDENTIFY all authorized channels through which YOUR ASSERTED WORKS have been
 7 made available to the public, whether for sale or otherwise, including all websites (by URL) and retail
 8 outlets (by name and location) and the dates they were available in such channels.

9 **RESPONSE TO INTERROGATORY NO. 9:**

10 Subject to and without waiving any of the general objections, and subject to such additional
 11 facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
 12 Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this
 13 Interrogatory to the extent that the terms "authorized channels" and "otherwise" are vague and
 14 ambiguous. Plaintiff further objects to this Interrogatory as unduly burdensome, not relevant to any
 15 claim or defense, and disproportionate to the needs of the case.

16 Subject to the above general and specific objections and to the extent possible, Plaintiff
 17 responds that given that the requested information is unknown to Plaintiff and the Interrogatory is
 18 impossible to answer as written, Plaintiff is willing to meet and confer regarding the scope of
 19 information sought by this Interrogatory.

20 **INTERROGATORY NO. 10:**

21 DESCRIBE all damages or other injury YOU have allegedly suffered as a result of Meta's
 22 conduct alleged in the ACTION, including but not limited to IDENTIFICATION of all bases for such
 23 damages or injury, any financial figures or DOCUMENTS used or referenced as the basis for
 24 computing such damages, methodology for computing such damages and injury, and all PERSONS
 25 who supplied knowledge or information that informed the foregoing.

26 **RESPONSE TO INTERROGATORY NO. 10:**

27 Subject to and without waiving any of the general objections, and subject to such additional
 28 facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this

Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this Interrogatory to the extent that the term “damages” is vague and overbroad. Plaintiff objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the interrogatory seeks “all PERSONS who supplied knowledge or information.” Plaintiff objects to this Interrogatory to the extent that it calls for a response subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff further objects to this Interrogatory to the extent that it is premature as it calls for information relating to damages that will be the subject of expert discovery, and objects to the extent that this Interrogatory seeks information related to expert witness work product. Plaintiff also objects to this Interrogatory on the grounds that the information requested is equally available to Defendant, or is already in its possession, custody, or control. Plaintiff objects to this Interrogatory to the extent that it is duplicative, in whole or in part, of Meta’s First Set of Requests for Production Nos. 23, 24, 25, and 26.

Subject to the above general and specific objections Plaintiff will not respond to the Interrogatory at this time.

INTERROGATORY NO. 11:

IDENTIFY each PERSON, other than Plaintiffs’ respective attorneys, who supplied information in response to Meta’s discovery requests in this ACTION (including Document Requests, Requests for Admission, and Interrogatories propounded by Meta) and/or whose DOCUMENTS or data were consulted in connection with such responses, and, as to the Interrogatories, specify for which Interrogatories such PERSON has supplied information.

RESPONSE TO INTERROGATORY NO. 11:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this Interrogatory to the extent that the term “data” is vague and ambiguous. Plaintiff further objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the interrogatory seeks “each PERSON.” Plaintiff objects to this

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*Counsel for Individual and Representative
Plaintiffs and the Proposed Class*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC

**PLAINTIFF LAURA LIPPMAN'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS, INC.'S
FIRST SET OF INTERROGATORIES**

OBJECTIONS AND RESPONSES TO INDIVIDUAL INTERROGATORIES

INTERROGATORY NO. 1:

IDENTIFY all PERSONS who had a role, involvement, and/or contribution to the creation of each of YOUR ASSERTED WORKS, including by providing (i) their contact information; (ii) a description of their role, involvement, or contribution; (iii) how if at all they were compensated; and (iv) whether there is any agreement with such PERSONS relating to the ownership of YOUR ASSERTED WORKS.

RESPONSE TO INTERROGATORY NO. 1:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is compound, overbroad and unduly burdensome. Each subpart is a separate Interrogatory, each which counts separately toward Plaintiffs' limit under the Federal Rules. Plaintiff objects to the terms "their role, involvement, and/or contribution" as vague and ambiguous. Plaintiff objects to the term "agreement" as vague and ambiguous. Plaintiff further objects to this Interrogatory as seeking information not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the interrogatory seeks "all PERSONS." Plaintiff further objects to this Interrogatory to the extent that it calls for a response subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure.

Subject to the above general and specific objections and to the extent possible, Plaintiff responds that he will identify only PERSONS, other than Plaintiff, a) who were direct aides (e.g., researchers), who were paid to contribute to the ASSERTED WORKS or b) those whose work was used in the ASSERTED WORKS under a license. Subject to the above general and specific objections, Plaintiff responds that neither (a) nor (b) is applicable to Plaintiff's ASSERTED WORKS.

INTERROGATORY NO. 2:

IDENTIFY all PERSONS (including, but not limited to YOU and YOUR publishers) who claim an ownership interest in any of YOUR ASSERTED WORKS (whether by assignment, license,

1 or otherwise), including by providing (i) their contact information; and (ii) a description of their
 2 ownership interest.

3 **RESPONSE TO INTERROGATORY NO. 2:**

4 Subject to and without waiving any of the general objections, and subject to such additional
 5 facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
 6 Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this
 7 Interrogatory to the extent that the term “ownership interest” is vague and ambiguous. Plaintiff further
 8 objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and
 9 disproportionate to the needs of the case. Plaintiff objects to this Interrogatory to the extent that it is
 10 duplicative, in whole or in part, of Meta’s First Set of Requests for Production No. 10.

11 Subject to the above general and specific objections and to the extent possible, Plaintiff states
 12 that pursuant to Federal Rule of Civil Procedure 33, she will produce documents, identifying all
 13 PERSONS (including, but not limited to Plaintiff and her publishers) who claim an ownership interest
 14 in any of Plaintiff’s ASSERTED WORKS (whether by assignment, license, or otherwise), which
 15 includes (i) their contact information; and (ii) a description of their ownership interest, if those
 16 documents exist. Plaintiff further refers Defendant to Plaintiff’s response to Meta’s First Set of
 17 Requests for Production No. 10.

18 **INTERROGATORY NO. 3:**

19 IDENTIFY and DESCRIBE the basis for YOUR assertion of copyright ownership in each of
 20 YOUR respective ASSERTED WORKS, including all evidence upon which YOU based such
 21 assertion.

22 **RESPONSE TO INTERROGATORY NO. 3:**

23 Subject to and without waiving any of the general objections, and subject to such additional
 24 facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
 25 Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this
 26 Interrogatory to the extent that the term “basis for YOUR assertion” is vague and the term “copyright
 27 ownership” is ambiguous. Plaintiff further objects to this Interrogatory as unduly burdensome, not
 28

1 further objects to this Interrogatory to the extent that it calls for a response subject to the attorney-client
2 privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure.
3 Plaintiff objects to this Interrogatory to the extent that it is duplicative, in whole or in part, of
4 Interrogatory Nos. 5, 6 and 7 and Meta's First Set of Requests for Production Nos. 2 and 3.

5 Subject to the above general and specific objections and to the extent possible, Plaintiff
6 responds that Plaintiff is willing to meet and confer to narrow the scope of this Interrogatory.

7 **INTERROGATORY NO. 9:**

8 IDENTIFY all authorized channels through which YOUR ASSERTED WORKS have been
9 made available to the public, whether for sale or otherwise, including all websites (by URL) and retail
10 outlets (by name and location) and the dates they were available in such channels.

11 **RESPONSE TO INTERROGATORY NO. 9:**

12 Subject to and without waiving any of the general objections, and subject to such additional
13 facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
14 Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this
15 Interrogatory to the extent that the terms "authorized channels" and "otherwise" are vague and
16 ambiguous. Plaintiff further objects to this Interrogatory as unduly burdensome, not relevant to any
17 claim or defense, and disproportionate to the needs of the case.

18 Subject to the above general and specific objections and to the extent possible, Plaintiff
19 responds that given that the requested information is unknown to Plaintiff and the Interrogatory is
20 impossible to answer as written, Plaintiff is willing to meet and confer regarding the scope of
21 information sought by this Interrogatory.

22 **INTERROGATORY NO. 10:**

23 DESCRIBE all damages or other injury YOU have allegedly suffered as a result of Meta's
24 conduct alleged in the ACTION, including but not limited to IDENTIFICATION of all bases for such
25 damages or injury, any financial figures or DOCUMENTS used or referenced as the basis for
26 computing such damages, methodology for computing such damages and injury, and all PERSONS
27 who supplied knowledge or information that informed the foregoing.

28 **RESPONSE TO INTERROGATORY NO. 10:**

1 Subject to and without waiving any of the general objections, and subject to such additional
 2 facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
 3 Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this
 4 Interrogatory to the extent that the term “damages” is vague and overbroad. Plaintiff objects to this
 5 Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the
 6 needs of the case, particularly because the interrogatory seeks “all PERSONS who supplied knowledge
 7 or information.” Plaintiff objects to this Interrogatory to the extent that it calls for a response subject to
 8 the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection
 9 from disclosure. Plaintiff further objects to this Interrogatory to the extent that it is premature as it calls
 10 for information relating to damages that will be the subject of expert discovery, and objects to the
 11 extent that this Interrogatory seeks information related to expert witness work product. Plaintiff also
 12 objects to this Interrogatory on the grounds that the information requested is equally available to
 13 Defendant, or is already in its possession, custody, or control. Plaintiff objects to this Interrogatory to
 14 the extent that it is duplicative, in whole or in part, of Meta’s First Set of Requests for Production Nos.
 15 23, 24, 25, and 26.

16 Subject to the above general and specific objections Plaintiff will not respond to the
 17 Interrogatory at this time.

18 **INTERROGATORY NO. 11:**

19 IDENTIFY each PERSON, other than Plaintiffs’ respective attorneys, who supplied
 20 information in response to Meta’s discovery requests in this ACTION (including Document Requests,
 21 Requests for Admission, and Interrogatories propounded by Meta) and/or whose DOCUMENTS or
 22 data were consulted in connection with such responses, and, as to the Interrogatories, specify for which
 23 Interrogatories such PERSON has supplied information.

24 **RESPONSE TO INTERROGATORY NO. 11:**

25 Subject to and without waiving any of the general objections, and subject to such additional
 26 facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
 27 Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this
 28 Interrogatory to the extent that the term “data” is vague and ambiguous. Plaintiff further objects to this

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*Counsel for Individual and Representative
Plaintiffs and the Proposed Class*

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC
Related Case No. 4:23-cv-06663

**PLAINTIFF SARAH SILVERMAN'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS,
INC.'S FIRST SET OF
INTERROGATORIES**

OBJECTIONS AND RESPONSES TO INDIVIDUAL INTERROGATORIES

INTERROGATORY NO. 1:

IDENTIFY all PERSONS who had a role, involvement, and/or contribution to the creation of each of YOUR ASSERTED WORKS, including by providing (i) their contact information; (ii) a description of their role, involvement, or contribution; (iii) how if at all they were compensated; and (iv) whether there is any agreement with such PERSONS relating to the ownership of YOUR ASSERTED WORKS.

RESPONSE TO INTERROGATORY NO. 1:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is compound, overbroad in nature, and is nonsensical. Each subpart is a separate Interrogatory, each which counts toward Defendant's limit under the Federal Rules. Plaintiff objects to the terms "their role, involvement, and/or contribution" as vague and ambiguous. Plaintiff objects to the term "agreement" as vague and ambiguous. Plaintiff objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the interrogatory seeks "all PERSONS." Plaintiff further objects to this Interrogatory to the extent that it calls for a response subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure.

Without foregoing the above general and specific objections and to the extent possible, Plaintiff responds that she will identify only PERSONS, other than Plaintiff, a) who were direct aides (e.g., researchers), who were paid to contribute to the ASSERTED WORKS or b) those whose work was used in the ASSERTED WORKS under a license. Plaintiff responds for *The Bedwetter*, Dana Goodyear and Dan Sterling were contracted on a work-for-hire basis as contributors. The contracts with Ms. Goodyear and Mr. Sterling will be produced as part of Plaintiff's response to Meta's First Set of Requests for Production No. 10.

INTERROGATORY NO. 2:

IDENTIFY all PERSONS (including, but not limited to YOU and YOUR publishers) who claim an ownership interest in any of YOUR ASSERTED WORKS (whether by assignment, license, or

otherwise), including by providing (i) their contact information; and (ii) a description of their ownership interest.

RESPONSE TO INTERROGATORY NO. 2:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Interrogatory to the extent that the term “ownership interest” is vague and ambiguous. Plaintiff further objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case. Plaintiff objects to this Interrogatory to the extent that it is duplicative, in whole or in part, of Meta’s First Set of Requests for Production No. 10.

Without foregoing the above general and specific objections and to the extent possible, Plaintiff states that pursuant to Federal Rule of Civil Procedure 33, she will produce documents, identifying all PERSONS (including, but not limited to Plaintiff and her publishers) who claim an ownership interest in any of Plaintiff’s ASSERTED WORKS (whether by assignment, license, or otherwise), which includes (i) their contact information; and (ii) a description of their ownership interest, if those documents exist. Plaintiff further refers the propounding party to Plaintiff’s response to Meta’s First Set of Requests for Production No. 10.

INTERROGATORY NO. 3:

IDENTIFY and DESCRIBE the basis for YOUR assertion of copyright ownership in each of YOUR respective ASSERTED WORKS, including all evidence upon which YOU based such assertion.

RESPONSE TO INTERROGATORY NO. 3:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Interrogatory to the extent that the term “basis for YOUR assertion” is vague and the term “copyright ownership” is ambiguous. Plaintiff further objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the interrogatory seeks “all evidence.”

RESPONSE TO INTERROGATORY NO. 9:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Interrogatory to the extent that the terms “authorized channels” and “otherwise” are vague and ambiguous. Plaintiff further objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case.

Without foregoing the above general and specific objections and to the extent possible, Plaintiff responds that given that the requested information is unknown to Plaintiff and the Interrogatory is impossible to answer as written, Plaintiff is willing to meet and confer regarding the scope of information sought by this Interrogatory.

INTERROGATORY NO. 10:

DESCRIBE all damages or other injury YOU have allegedly suffered as a result of Meta’s conduct alleged in the ACTION, including but not limited to IDENTIFICATION of all bases for such damages or injury, any financial figures or DOCUMENTS used or referenced as the basis for computing such damages, methodology for computing such damages and injury, and all PERSONS who supplied knowledge or information that informed the foregoing.

RESPONSE TO INTERROGATORY NO. 10:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Interrogatory to the extent that the term “damages” is vague and overbroad. Plaintiff objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the interrogatory seeks “all PERSONS who supplied knowledge or information.” Plaintiff objects to this Interrogatory to the extent that it calls for a response subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff further objects to this Interrogatory to the extent that it calls for information relating to damages that will be the subject of expert discovery, and objects to the extent that this

1 Interrogatory seeks information related to expert witness work product. Plaintiff objects to this
 2 Interrogatory on the grounds that such information is equally available to Defendant, or is already in its
 3 possession, custody, or control. Plaintiff objects to this Interrogatory to the extent that it is duplicative,
 4 in whole or in part, of Meta's First Set of Requests for Production Nos. 23, 24, 25, 26.

5 Without foregoing the above general and specific objections and to the extent possible, Plaintiff
 6 responds that this Interrogatory is premature, and Plaintiff will not respond to the Interrogatory at this
 7 time.

8 **INTERROGATORY NO. 11:**

9 IDENTIFY each PERSON, other than Plaintiffs' respective attorneys, who supplied
 10 information in response to Meta's discovery requests in this ACTION (including Document Requests,
 11 Requests for Admission, and Interrogatories propounded by Meta) and/or whose DOCUMENTS or
 12 data were consulted in connection with such responses, and, as to the Interrogatories, specify for which
 13 Interrogatories such PERSON has supplied information.

14 **RESPONSE TO INTERROGATORY NO. 11:**

15 Subject to and without waiving any of the general objections, and subject to such additional facts
 16 that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
 17 Interrogatory to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 18 Interrogatory to the extent that the term "data" is vague and ambiguous. Plaintiff further objects to this
 19 Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the
 20 needs of the case, particularly because the interrogatory seeks "each PERSON." Plaintiff objects to this
 21 Interrogatory to the extent that it calls for a response subject to the attorney-client privilege, work
 22 product doctrine, and/or any other applicable privilege or protection from disclosure.

23 Without foregoing the above general and specific objections and to the extent possible, Plaintiff
 24 responds that Plaintiff and their counsel were the PERSONS supplying information in response to
 25 Meta's First Set of Interrogatories.

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC

**PLAINTIFF JACQUELINE WOODSON'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS, INC.'S
FIRST SET OF INTERROGATORIES**

INTERROGATORY NO. 2:

IDENTIFY all PERSONS (including, but not limited to YOU and YOUR publishers) who claim an ownership interest in any of YOUR ASSERTED WORKS (whether by assignment, license, or otherwise), including by providing (i) their contact information; and (ii) a description of their ownership interest.

RESPONSE TO INTERROGATORY NO. 2:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this Interrogatory to the extent that the term “ownership interest” is vague and ambiguous. Plaintiff further objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case. Plaintiff objects to this Interrogatory to the extent that it is duplicative, in whole or in part, of Meta’s First Set of Requests for Production No. 10.

Subject to the above general and specific objections and to the extent possible, Plaintiff states that pursuant to Federal Rule of Civil Procedure 33, she will produce documents, identifying all PERSONS (including, but not limited to Plaintiff and her publishers) who claim an ownership interest in any of Plaintiff’s ASSERTED WORKS (whether by assignment, license, or otherwise), which includes (i) their contact information; and (ii) a description of their ownership interest, if those documents exist. Plaintiff further refers Defendant to Plaintiff’s response to Meta’s First Set of Requests for Production No. 10.

INTERROGATORY NO. 3:

IDENTIFY and DESCRIBE the basis for YOUR assertion of copyright ownership in each of YOUR respective ASSERTED WORKS, including all evidence upon which YOU based such assertion.

RESPONSE TO INTERROGATORY NO. 3:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this

1 impossible to answer as written, Plaintiff is willing to meet and confer regarding the scope of
2 information sought by this Interrogatory.

3 **INTERROGATORY NO. 10:**

4 DESCRIBE all damages or other injury YOU have allegedly suffered as a result of Meta's
5 conduct alleged in the ACTION, including but not limited to IDENTIFICATION of all bases for such
6 damages or injury, any financial figures or DOCUMENTS used or referenced as the basis for
7 computing such damages, methodology for computing such damages and injury, and all PERSONS
8 who supplied knowledge or information that informed the foregoing.

9 **RESPONSE TO INTERROGATORY NO. 10:**

10 Subject to and without waiving any of the general objections, and subject to such additional
11 facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
12 Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this
13 Interrogatory to the extent that the term "damages" is vague and overbroad. Plaintiff objects to this
14 Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the
15 needs of the case, particularly because the interrogatory seeks "all PERSONS who supplied knowledge
16 or information." Plaintiff objects to this Interrogatory to the extent that it calls for a response subject to
17 the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection
18 from disclosure. Plaintiff further objects to this Interrogatory to the extent that it is premature as it calls
19 for information relating to damages that will be the subject of expert discovery, and objects to the
20 extent that this Interrogatory seeks information related to expert witness work product. Plaintiff also
21 objects to this Interrogatory on the grounds that the information requested is equally available to
22 Defendant, or is already in its possession, custody, or control. Plaintiff objects to this Interrogatory to
23 the extent that it is duplicative, in whole or in part, of Meta's First Set of Requests for Production Nos.
24 23, 24, 25, and 26.

25 Subject to the above general and specific objections Plaintiff will not respond to the
26 Interrogatory at this time.

Joseph R. Saveri (State Bar No. 130064)
Cadio Zirpoli (State Bar No. 179108)
Christopher K.L. Young (State Bar No.
318371)
Travis Manfredi (State Bar No. 281779)
Holden Benon (State Bar No. 325847)
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*Counsel for Individual and Representative
Plaintiffs and the Proposed Class*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC

**PLAINTIFF TA-NEHISI COATES'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS, INC.'S
FIRST SET OF INTERROGATORIES**

INTERROGATORY NO. 2:

IDENTIFY all PERSONS (including, but not limited to YOU and YOUR publishers) who claim an ownership interest in any of YOUR ASSERTED WORKS (whether by assignment, license, or otherwise), including by providing (i) their contact information; and (ii) a description of their ownership interest.

RESPONSE TO INTERROGATORY NO. 2:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this Interrogatory to the extent that the term “ownership interest” is vague and ambiguous. Plaintiff further objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case. Plaintiff objects to this Interrogatory to the extent that it is duplicative, in whole or in part, of Meta’s First Set of Requests for Production No. 10.

Subject to the above general and specific objections and to the extent possible, Plaintiff states that pursuant to Federal Rule of Civil Procedure 33, she will produce documents, identifying all PERSONS (including, but not limited to Plaintiff and his publishers) who claim an ownership interest in any of Plaintiff’s ASSERTED WORKS (whether by assignment, license, or otherwise), which includes (i) their contact information; and (ii) a description of their ownership interest, if those documents exist. Plaintiff further refers Defendant to Plaintiff’s response to Meta’s First Set of Requests for Production No. 10.

INTERROGATORY NO. 3:

IDENTIFY and DESCRIBE the basis for YOUR assertion of copyright ownership in each of YOUR respective ASSERTED WORKS, including all evidence upon which YOU based such assertion.

RESPONSE TO INTERROGATORY NO. 3:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff

1 objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and
2 disproportionate to the needs of the case, particularly because the interrogatory seeks “any
3 COMMUNICATIONS.” Plaintiff further objects to this Interrogatory to the extent that it calls for
4 a response subject to the attorney-client privilege, work product doctrine, and/or any other
5 applicable privilege or protection from disclosure. Plaintiff objects to this Interrogatory to the
6 extent that it is duplicative, in whole or in part, of Interrogatory Nos. 5, 6 and 7 and Meta’s
7 First Set of Requests for Production Nos. 2 and 3.

8 Subject to the above general and specific objections and to the extent possible,
9 Plaintiff responds that Plaintiff is willing to meet and confer to narrow the scope of this
10 Interrogatory.

11 **INTERROGATORY NO. 9:**

12 IDENTIFY all authorized channels through which YOUR ASSERTED WORKS have
13 been made available to the public, whether for sale or otherwise, including all websites (by
14 URL) and retail outlets (by name and location) and the dates they were available in such
15 channels.

16 **RESPONSE TO INTERROGATORY NO. 9:**

17 Subject to and without waiving any of the general objections, and subject to such
18 additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff
19 objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff
20 objects to this Interrogatory to the extent that the terms “authorized channels” and “otherwise”
21 are vague and ambiguous. Plaintiff further objects to this Interrogatory as unduly
22 burdensome, not relevant to any claim or defense, and disproportionate to the needs of the
23 case.

24 Subject to the above general and specific objections and to the extent possible,
25 Plaintiff responds that given that the requested information is unknown to Plaintiff and the
26 Interrogatory is impossible to answer as written, Plaintiff is willing to meet and confer
27 regarding the scope of information sought by this Interrogatory.

28 **INTERROGATORY NO. 10:**

DESCRIBE all damages or other injury YOU have allegedly suffered as a result of Meta's conduct alleged in the ACTION, including but not limited to IDENTIFICATION of all bases for such damages or injury, any financial figures or DOCUMENTS used or referenced as the basis for computing such damages, methodology for computing such damages and injury, and all PERSONS who supplied knowledge or information that informed the foregoing.

RESPONSE TO INTERROGATORY NO. 10:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this Interrogatory to the extent that the term "damages" is vague and overbroad. Plaintiff objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the interrogatory seeks "all PERSONS who supplied knowledge or information." Plaintiff objects to this Interrogatory to the extent that it calls for a response subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff further objects to this Interrogatory to the extent that it is premature as it calls for information relating to damages that will be the subject of expert discovery, and objects to the extent that this Interrogatory seeks information related to expert witness work product. Plaintiff also objects to this Interrogatory on the grounds that the information requested is equally available to Defendant, or is already in its possession, custody, or control. Plaintiff objects to this Interrogatory to the extent that it is duplicative, in whole or in part, of Meta's First Set of Requests for Production Nos. 23, 24, 25, and 26.

Subject to the above general and specific objections Plaintiff will not respond to the Interrogatory at this time.

INTERROGATORY NO. 11:

IDENTIFY each PERSON, other than Plaintiffs' respective attorneys, who supplied information in response to Meta's discovery requests in this ACTION (including Document Requests, Requests for Admission, and Interrogatories propounded by Meta) and/or whose

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Christopher K.L. Young (State Bar No.
318371)
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*Counsel for Individual and Representative
Plaintiffs and the Proposed Class*

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Lead Case No. 3:23-cv-03417-VC

**PLAINTIFF JUNOT DÍAZ'S RESPONSES
AND OBJECTIONS TO DEFENDANT
META PLATFORMS, INC.'S FIRST SET
OF INTERROGATORIES**

OBJECTIONS AND RESPONSES TO INDIVIDUAL INTERROGATORIES**INTERROGATORY NO. 1:**

IDENTIFY all PERSONS who had a role, involvement, and/or contribution to the creation of each of YOUR ASSERTED WORKS, including by providing (i) their contact information; (ii) a description of their role, involvement, or contribution; (iii) how if at all they were compensated; and (iv) whether there is any agreement with such PERSONS relating to the ownership of YOUR ASSERTED WORKS.

RESPONSE TO INTERROGATORY NO. 1:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is compound, overbroad and unduly burdensome. Each subpart is a separate Interrogatory, each which counts separately toward Plaintiffs' limit under the Federal Rules. Plaintiff objects to the terms "their role, involvement, and/or contribution" as vague and ambiguous. Plaintiff objects to the term "agreement" as vague and ambiguous. Plaintiff further objects to this Interrogatory as seeking information not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the interrogatory seeks "all PERSONS." Plaintiff further objects to this Interrogatory to the extent that it calls for a response subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure.

Subject to the above general and specific objections and to the extent possible, Plaintiff responds that he will identify only PERSONS, other than Plaintiff, a) who were direct aides (e.g., researchers), who were paid to contribute to the ASSERTED WORKS or b) those whose work was used in the ASSERTED WORKS under a license. Subject to the above general and specific objections, Plaintiff responds that neither (a) nor (b) is applicable to Plaintiff's ASSERTED WORKS.

INTERROGATORY NO. 2:

IDENTIFY all PERSONS (including, but not limited to YOU and YOUR publishers) who claim an ownership interest in any of YOUR ASSERTED WORKS (whether by assignment, license, or otherwise), including by providing (i) their contact information; and (ii) a description of their ownership interest.

RESPONSE TO INTERROGATORY NO. 2:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this Interrogatory to the extent that the term “ownership interest” is vague and ambiguous. Plaintiff further objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case. Plaintiff objects to this Interrogatory to the extent that it is duplicative, in whole or in part, of Meta’s First Set of Requests for Production No. 10.

Subject to the above general and specific objections and to the extent possible, Plaintiff states that pursuant to Federal Rule of Civil Procedure 33, she will produce documents, identifying all PERSONS (including, but not limited to Plaintiff and his publishers) who claim an ownership interest in any of Plaintiff’s ASSERTED WORKS (whether by assignment, license, or otherwise), which includes (i) their contact information; and (ii) a description of their ownership interest, if those documents exist. Plaintiff further refers Defendant to Plaintiff’s response to Meta’s First Set of Requests for Production No. 10.

INTERROGATORY NO. 3:

IDENTIFY and DESCRIBE the basis for YOUR assertion of copyright ownership in each of YOUR respective ASSERTED WORKS, including all evidence upon which YOU based such assertion.

RESPONSE TO INTERROGATORY NO. 3:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff

1 disproportionate to the needs of the case, particularly because the interrogatory seeks “any
2 COMMUNICATIONS.” Plaintiff further objects to this Interrogatory to the extent that it calls for
3 a response subject to the attorney-client privilege, work product doctrine, and/or any other
4 applicable privilege or protection from disclosure. Plaintiff objects to this Interrogatory to the
5 extent that it is duplicative, in whole or in part, of Interrogatory Nos. 5, 6 and 7 and Meta’s
6 First Set of Requests for Production Nos. 2 and 3.

7 Subject to the above general and specific objections and to the extent possible,
8 Plaintiff responds that Plaintiff is willing to meet and confer to narrow the scope of this
9 Interrogatory.

10 **INTERROGATORY NO. 9:**

11 IDENTIFY all authorized channels through which YOUR ASSERTED WORKS have
12 been made available to the public, whether for sale or otherwise, including all websites (by
13 URL) and retail outlets (by name and location) and the dates they were available in such
14 channels.

15 **RESPONSE TO INTERROGATORY NO. 9:**

16 Subject to and without waiving any of the general objections, and subject to such
17 additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff
18 objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff
19 objects to this Interrogatory to the extent that the terms “authorized channels” and “otherwise”
20 are vague and ambiguous. Plaintiff further objects to this Interrogatory as unduly
21 burdensome, not relevant to any claim or defense, and disproportionate to the needs of the
22 case.

23 Subject to the above general and specific objections and to the extent possible,
24 Plaintiff responds that given that the requested information is unknown to Plaintiff and the
25 Interrogatory is impossible to answer as written, Plaintiff is willing to meet and confer
26 regarding the scope of information sought by this Interrogatory.

27 **INTERROGATORY NO. 10:**

DESCRIBE all damages or other injury YOU have allegedly suffered as a result of Meta's conduct alleged in the ACTION, including but not limited to IDENTIFICATION of all bases for such damages or injury, any financial figures or DOCUMENTS used or referenced as the basis for computing such damages, methodology for computing such damages and injury, and all PERSONS who supplied knowledge or information that informed the foregoing.

RESPONSE TO INTERROGATORY NO. 10:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this Interrogatory to the extent that the term "damages" is vague and overbroad. Plaintiff objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the interrogatory seeks "all PERSONS who supplied knowledge or information." Plaintiff objects to this Interrogatory to the extent that it calls for a response subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff further objects to this Interrogatory to the extent that it is premature as it calls for information relating to damages that will be the subject of expert discovery, and objects to the extent that this Interrogatory seeks information related to expert witness work product. Plaintiff also objects to this Interrogatory on the grounds that the information requested is equally available to Defendant, or is already in its possession, custody, or control. Plaintiff objects to this Interrogatory to the extent that it is duplicative, in whole or in part, of Meta's First Set of Requests for Production Nos. 23, 24, 25, and 26.

Subject to the above general and specific objections Plaintiff will not respond to the Interrogatory at this time.

INTERROGATORY NO. 11:

IDENTIFY each PERSON, other than Plaintiffs' respective attorneys, who supplied information in response to Meta's discovery requests in this ACTION (including Document Requests, Requests for Admission, and Interrogatories propounded by Meta) and/or whose

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*Counsel for Individual and Representative
Plaintiffs and the Proposed Class*

**UNITED STATES DISTRICT COURT
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Richard Kadrey, et al.,

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Meta Platforms, Inc.,

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Lead Case No. 3:23-cv-03417-VC

**PLAINTIFF DAVID HENRY HWANG'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS, INC.'S
FIRST SET OF INTERROGATORIES**

Lead Case No. 3:23-cv-03417-VC

PLAINTIFF DAVID HENRY HWANG'S RESPONSES AND OBJECTIONS TO DEFENDANT META
PLATFORMS, INC.'S FIRST SET OF INTERROGATORIES

INTERROGATORY NO. 2:

IDENTIFY all PERSONS (including, but not limited to YOU and YOUR publishers) who claim an ownership interest in any of YOUR ASSERTED WORKS (whether by assignment, license, or otherwise), including by providing (i) their contact information; and (ii) a description of their ownership interest.

RESPONSE TO INTERROGATORY NO. 2:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this Interrogatory to the extent that the term “ownership interest” is vague and ambiguous. Plaintiff further objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case. Plaintiff objects to this Interrogatory to the extent that it is duplicative, in whole or in part, of Meta’s First Set of Requests for Production No. 10.

Subject to the above general and specific objections and to the extent possible, Plaintiff states that pursuant to Federal Rule of Civil Procedure 33, she will produce documents, identifying all PERSONS (including, but not limited to Plaintiff and his publishers) who claim an ownership interest in any of Plaintiff’s ASSERTED WORKS (whether by assignment, license, or otherwise), which includes (i) their contact information; and (ii) a description of their ownership interest, if those documents exist. Plaintiff further refers Defendant to Plaintiff’s response to Meta’s First Set of Requests for Production No. 10.

INTERROGATORY NO. 3:

IDENTIFY and DESCRIBE the basis for YOUR assertion of copyright ownership in each of YOUR respective ASSERTED WORKS, including all evidence upon which YOU based such assertion.

RESPONSE TO INTERROGATORY NO. 3:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff

1 a response subject to the attorney-client privilege, work product doctrine, and/or any other
2 applicable privilege or protection from disclosure. Plaintiff objects to this Interrogatory to the
3 extent that it is duplicative, in whole or in part, of Interrogatory Nos. 5, 6 and 7 and Meta's
4 First Set of Requests for Production Nos. 2 and 3.

5 Subject to the above general and specific objections and to the extent possible,
6 Plaintiff responds that Plaintiff is willing to meet and confer to narrow the scope of this
7 Interrogatory.

8 **INTERROGATORY NO. 9:**

9 IDENTIFY all authorized channels through which YOUR ASSERTED WORKS have
10 been made available to the public, whether for sale or otherwise, including all websites (by
11 URL) and retail outlets (by name and location) and the dates they were available in such
12 channels.

13 **RESPONSE TO INTERROGATORY NO. 9:**

14 Subject to and without waiving any of the general objections, and subject to such
15 additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff
16 objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff
17 objects to this Interrogatory to the extent that the terms "authorized channels" and "otherwise"
18 are vague and ambiguous. Plaintiff further objects to this Interrogatory as unduly
19 burdensome, not relevant to any claim or defense, and disproportionate to the needs of the
20 case.

21 Subject to the above general and specific objections and to the extent possible,
22 Plaintiff responds that given that the requested information is unknown to Plaintiff and the
23 Interrogatory is impossible to answer as written, Plaintiff is willing to meet and confer
24 regarding the scope of information sought by this Interrogatory.

25 **INTERROGATORY NO. 10:**

26 DESCRIBE all damages or other injury YOU have allegedly suffered as a result of
27 Meta's conduct alleged in the ACTION, including but not limited to IDENTIFICATION of all
28 bases for such damages or injury, any financial figures or DOCUMENTS used or referenced

as the basis for computing such damages, methodology for computing such damages and injury, and all PERSONS who supplied knowledge or information that informed the foregoing.

RESPONSE TO INTERROGATORY NO. 10:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this Interrogatory to the extent that the term “damages” is vague and overbroad. Plaintiff objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the interrogatory seeks “all PERSONS who supplied knowledge or information.” Plaintiff objects to this Interrogatory to the extent that it calls for a response subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff further objects to this Interrogatory to the extent that it is premature as it calls for information relating to damages that will be the subject of expert discovery, and objects to the extent that this Interrogatory seeks information related to expert witness work product. Plaintiff also objects to this Interrogatory on the grounds that the information requested is equally available to Defendant, or is already in its possession, custody, or control. Plaintiff objects to this Interrogatory to the extent that it is duplicative, in whole or in part, of Meta’s First Set of Requests for Production Nos. 23, 24, 25, and 26.

Subject to the above general and specific objections Plaintiff will not respond to the Interrogatory at this time.

INTERROGATORY NO. 11:

IDENTIFY each PERSON, other than Plaintiffs’ respective attorneys, who supplied information in response to Meta’s discovery requests in this ACTION (including Document Requests, Requests for Admission, and Interrogatories propounded by Meta) and/or whose DOCUMENTS or data were consulted in connection with such responses, and, as to the Interrogatories, specify for which Interrogatories such PERSON has supplied information.

RESPONSE TO INTERROGATORY NO. 11:

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Cadio Zirpoli (State Bar No. 179108)
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*Counsel for Individual and Representative
Plaintiffs and the Proposed Class*

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**PLAINTIFF RACHEL LOUISE SNYDER 'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS, INC.'S
FIRST SET OF INTERROGATORIES**

INTERROGATORY NO. 2:

IDENTIFY all PERSONS (including, but not limited to YOU and YOUR publishers) who claim an ownership interest in any of YOUR ASSERTED WORKS (whether by assignment, license, or otherwise), including by providing (i) their contact information; and (ii) a description of their ownership interest.

RESPONSE TO INTERROGATORY NO. 2:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this Interrogatory to the extent that the term “ownership interest” is vague and ambiguous. Plaintiff further objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case. Plaintiff objects to this Interrogatory to the extent that it is duplicative, in whole or in part, of Meta’s First Set of Requests for Production No. 10.

Subject to the above general and specific objections and to the extent possible, Plaintiff states that pursuant to Federal Rule of Civil Procedure 33, she will produce documents, identifying all PERSONS (including, but not limited to Plaintiff and her publishers) who claim an ownership interest in any of Plaintiff’s ASSERTED WORKS (whether by assignment, license, or otherwise), which includes (i) their contact information; and (ii) a description of their ownership interest, if those documents exist. Plaintiff further refers Defendant to Plaintiff’s response to Meta’s First Set of Requests for Production No. 10.

INTERROGATORY NO. 3:

IDENTIFY and DESCRIBE the basis for YOUR assertion of copyright ownership in each of YOUR respective ASSERTED WORKS, including all evidence upon which YOU based such assertion.

RESPONSE TO INTERROGATORY NO. 3:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff

INTERROGATORY NO. 10:

DESCRIBE all damages or other injury YOU have allegedly suffered as a result of Meta's conduct alleged in the ACTION, including but not limited to IDENTIFICATION of all bases for such damages or injury, any financial figures or DOCUMENTS used or referenced as the basis for computing such damages, methodology for computing such damages and injury, and all PERSONS who supplied knowledge or information that informed the foregoing.

RESPONSE TO INTERROGATORY NO. 10:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this Interrogatory to the extent that the term "damages" is vague and overbroad. Plaintiff objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the interrogatory seeks "all PERSONS who supplied knowledge or information." Plaintiff objects to this Interrogatory to the extent that it calls for a response subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff further objects to this Interrogatory to the extent that it is premature as it calls for information relating to damages that will be the subject of expert discovery, and objects to the extent that this Interrogatory seeks information related to expert witness work product. Plaintiff also objects to this Interrogatory on the grounds that the information requested is equally available to Defendant, or is already in its possession, custody, or control. Plaintiff objects to this Interrogatory to the extent that it is duplicative, in whole or in part, of Meta's First Set of Requests for Production Nos. 23, 24, 25, and 26.

Subject to the above general and specific objections Plaintiff will not respond to the Interrogatory at this time.

INTERROGATORY NO. 11:

IDENTIFY each PERSON, other than Plaintiffs' respective attorneys, who supplied information in response to Meta's discovery requests in this ACTION (including Document

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

RICHARD KADREY, SARAH SILVERMAN,
CHRISTOPHER GOLDEN, TA-NEHISI
COATES, JUNOT DÍAZ, ANDREW SEAN
GREER, DAVID HENRY HWANG,
MATTHEW KLAM, LAURA LIPPMAN,
RACHEL LOUISE SNYDER, JACQUELINE
WOODSON, AND LYSA TERKEURST,

Individual and Representative Plaintiffs,

v.

META PLATFORMS, INC.;

Defendant.

Case No. 3:23-cv-03417-VC

**PLAINTIFF LYSA TERKEURST'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS,
INC.'S FIRST SET OF
INTERROGATORIES**

PROPOUNDING PARTY: Defendant Meta Platforms, Inc.

RESPONDING PARTY: Lysa TerKeurst

SET NUMBER: One (1)

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiff Lysa TerKeurst ("Plaintiff") in the above-titled action hereby responds to Defendant Meta Platforms, Inc.'s ("Defendant" or "Meta") First Set of Interrogatories (the "Interrogatories"). Because certain of Plaintiff's responses and objections contain personal identifying information which would cause substantial harm if revealed, Plaintiff designates these responses and objections as Highly Confidential.

1 Amanda Bacon – Senior Content Coordinator and Executive Assistant. Responsible for
 2 saving content into files, content tracking. Also responsible for gathering initial chapters on works,
 3 and engages focus groups for feedback.

4 Shae Hill – Content Manager, responsible for taking content from book writing and
 5 converting into internet, magazine, newspaper, and other media content.

6 In addition, Plaintiff identifies Jessica Rogers, who is the lead editor at HarperCollins,
 7 Plaintiff's publisher, who is responsible for editing and publishing Plaintiff's works. Ms. Rogers
 8 can be contacted through her employer, HarperCollins .

9 **INTERROGATORY NO. 2:**

10 IDENTIFY all PERSONS (including, but not limited to YOU and YOUR publishers) who
 11 claim an ownership interest in any of YOUR ASSERTED WORKS (whether by assignment,
 12 license, or otherwise), including by providing (i) their contact information; and (ii) a description
 13 of their ownership interest.

14 **RESPONSE TO INTERROGATORY NO. 2:**

15 Subject to and without waiving any of the general objections, and subject to such additional
 16 facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
 17 Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this
 18 Interrogatory to the extent that the term "ownership interest" is vague and ambiguous. Plaintiff
 19 further objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense,
 20 and disproportionate to the needs of the case. Plaintiff objects to this Interrogatory to the extent
 21 that it is duplicative, in whole or in part, of Meta's First Set of Requests for Production No. 10.

22 Subject to the above general and specific objections and to the extent possible, Plaintiff
 23 states that pursuant to Federal Rule of Civil Procedure 33, she will produce documents, identifying
 24 all PERSONS (including, but not limited to Plaintiff and her publishers) who claim an ownership
 25 interest in any of Plaintiff's ASSERTED WORKS (whether by assignment, license, or otherwise),
 26 which includes (i) their contact information; and (ii) a description of their ownership interest, if
 27

1 those documents exist. Plaintiff will supplement this response by identifying the responsive
2 documents by Bates number once produced.

3 **INTERROGATORY NO. 3:**

4 IDENTIFY and DESCRIBE the basis for YOUR assertion of copyright ownership in each
5 of YOUR respective ASSERTED WORKS, including all evidence upon which YOU based such
6 assertion.

7 **RESPONSE TO INTERROGATORY NO. 3:**

8 Subject to and without waiving any of the general objections, and subject to such additional
9 facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
10 Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this
11 Interrogatory to the extent that the term “basis for YOUR assertion” is vague and the term
12 “copyright ownership” is ambiguous. Plaintiff further objects to this Interrogatory as unduly
13 burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case,
14 particularly because the interrogatory seeks “all evidence.”

15 Subject to the above general and specific objections, Plaintiff responds that Plaintiff has
16 copyright ownership of the ASSERTED WORKS because Plaintiff is the author of the
17 ASSERTED WORKS. Answering further, Plaintiff refers Meta to information available via the
18 U.S. Copyright Office and/or the Library of Congress related to Plaintiff’s ASSERTED WORKS.
19 Plaintiff will also produce documents providing evidence of copyright ownership, and will
20 supplement this answer identifying the Bates ranges of these documents, once produced.

21 **INTERROGATORY NO. 4:**

22 For each of YOUR ASSERTED WORKS, IDENTIFY each instance in which another
23 PERSON has been licensed, permitted, or authorized to copy, display, distribute, publicly perform,
24 or otherwise exercise any Section 106 rights with respect to each ASSERTED WORK, including
25 by providing the date, PERSON, and agreement regarding each instance.

26 **RESPONSE TO INTERROGATORY NO. 4:**

1 and assistants regarding the fact that her ASSERTED WORKS were included in the Books3
2 dataset.

3 **INTERROGATORY NO. 9:**

4 IDENTIFY all authorized channels through which YOUR ASSERTED WORKS have
5 been made available to the public, whether for sale or otherwise, including all websites (by URL)
6 and retail outlets (by name and location) and the dates they were available in such channels.

7 **RESPONSE TO INTERROGATORY NO. 9:**

8 Subject to and without waiving any of the general objections, and subject to such additional
9 facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
10 Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this
11 Interrogatory to the extent that the terms “authorized channels” and “otherwise” are vague and
12 ambiguous. Plaintiff further objects to this Interrogatory as unduly burdensome, not relevant to
13 any claim or defense, and disproportionate to the needs of the case.

14 Subject to the above general and specific objections, Plaintiff responds that copies of
15 Plaintiffs’ ASSERTED WORKS have been available to purchase through the following
16 distribution channels: directly from her ministry (Proverbs31 Ministries), and also through online
17 retailers (e.g., Amazon), e-book retailers (e.g., Kindle), and brick and mortar retailers.

18 **INTERROGATORY NO. 10:**

19 DESCRIBE all damages or other injury YOU have allegedly suffered as a result of Meta’s
20 conduct alleged in the ACTION, including but not limited to IDENTIFICATION of all bases for
21 such damages or injury, any financial figures or DOCUMENTS used or referenced as the basis for
22 computing such damages, methodology for computing such damages and injury, and all
23 PERSONS who supplied knowledge or information that informed the foregoing.

24 **RESPONSE TO INTERROGATORY NO. 10:**

25 Subject to and without waiving any of the general objections, and subject to such additional
26 facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
27 Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this

Interrogatory to the extent that the term “damages” is vague and overbroad. Plaintiff objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the interrogatory seeks “all PERSONS who supplied knowledge or information.” Plaintiff objects to this Interrogatory to the extent that it calls for a response subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff further objects to this Interrogatory to the extent that it is premature as it calls for information relating to damages that will be the subject of expert discovery, and objects to the extent that this Interrogatory seeks information related to expert witness work product. Plaintiff also objects to this Interrogatory on the grounds that the information requested is equally available to Defendant, or is already in its possession, custody, or control. Plaintiff objects to this Interrogatory to the extent that it is duplicative, in whole or in part, of Meta’s First Set of Requests for Production Nos. 23, 24, 25, and 26.

Subject to the above general and specific objections, Plaintiffs are still investigating how Meta’s nascent technology is causing them harm. Plaintiff will supplement this response, and will provide reference to the Bates numbers of responsive documents, once produced.

INTERROGATORY NO. 11:

IDENTIFY each PERSON, other than Plaintiffs’ respective attorneys, who supplied information in response to Meta’s discovery requests in this ACTION (including Document Requests, Requests for Admission, and Interrogatories propounded by Meta) and/or whose DOCUMENTS or data were consulted in connection with such responses, and, as to the Interrogatories, specify for which Interrogatories such PERSON has supplied information.

RESPONSE TO INTERROGATORY NO. 11:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this Interrogatory to the extent that the term “data” is vague and ambiguous. Plaintiff further objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate